

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

C.S.,

Plaintiff,

v.

MINDGEEK S.A.R.L., a foreign entity;  
MG FREESITES LTD, a foreign entity;  
MINDGEEK USA INCORPORATED,  
a Delaware corporation; MG  
PREMIUM LTD, a foreign entity; MG  
GLOBAL ENTERTAINMENT INC., a  
Delaware corporation; 9219-1568  
QUEBEC, INC., a foreign entity;  
BERND BERGMAIR, a foreign  
individual; FERAS ANTOON, a  
foreign individual; DAVID  
TASSILLO, a foreign individual; VISA  
INC., a Delaware corporation;  
REDWOOD CAPITAL  
MANAGEMENT, LLC, a Delaware  
limited liability company; REDWOOD  
DOE FUNDS 1-7; COLBECK  
CAPITAL MANAGEMENT, LLC, a  
Delaware limited liability company;  
COLBECK DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04992-WLH-ADS

[DISCOVERY DOCUMENT:  
REFERRED TO MAGISTRATE  
JUDGE AUTUMN D. SPAETH]

Judicial Officer: Wesley L. Hsu

**STIPULATED PRE-TRIAL  
PROTECTIVE ORDER AS TO  
THE IDENTITY OF PLAINTIFF  
C.S.**

1           1.     Plaintiff alleges she is a victim of child sex trafficking and child  
2 pornography and commenced an action against Defendants in the above caption  
3 under a pseudonym. Plaintiff seeks a protective order governing the circumstances  
4 and terms by which her identity may be disclosed to and by Defendants to minimize  
5 the potential for alleged harassment were her identity disclosed, and to avoid the  
6 stigma and embarrassment that would accompany exposure of her identity beyond  
7 what is necessary in this litigation. In a related case against MindGeek, this Court  
8 recognized that a protective order would be an appropriate vehicle “to provide  
9 Defendants’ counsel with their true identities if necessary in the litigation.” *Fleites*  
10 *v. MindGeek S.A.R.L.*, [2021 WL 2766886](#), at \*1 (C.D. Cal. June 28, 2021).

11           2.     Counsel for Plaintiff shall provide to counsel for the Defendants the  
12 Plaintiff’s name and alias names used at any time (as recalled by Plaintiff) (“True  
13 Identity”) within 7 days of the entry of this Order.

14           3.     The Parties, as well as their agents, employees, and assigns, and any  
15 person or entity who has signed the agreement to be bound by this Protective Order  
16 (Exhibit A), shall keep the True Identity of Plaintiff confidential during and after the  
17 conclusion of this matter. The Parties reserve, however, all of their respective rights  
18 in discovery, including to issue subpoenas, take depositions, and request information  
19 and documents from or regarding any person who has knowledge of the creation,  
20 posting or distribution of any videos or images relevant to Plaintiff’s allegations.  
21 With that reservation, the Parties agree that they may only disclose Plaintiff’s True  
22 Identity to the following:

23           A. The Parties to this litigation, including any employees, agents, and  
24 representatives of the Parties as needed to litigate any claims or  
25 defenses;

26           B. Counsel for the Parties and employees, agents, and representatives of  
27 counsel as needed to litigate any claims or defenses;

28           C. The Court, and court personnel;

- 1 D. Any custodian of records, but only to the extent that Plaintiff's True  
2 Identity will assist the custodian in obtaining and producing records  
3 after signing the agreement to be bound by this Protective Order. If the  
4 custodian of records or their counsel fails or refuses to sign that  
5 agreement, the Parties shall meet and confer regarding the proposed  
6 disclosure. Consent shall not be unreasonably withheld. If the Parties  
7 fail to reach consent, they hereby agree that such dispute shall be  
8 resolved pursuant to the Magistrate Judge's Informal Discovery Dispute  
9 Resolution Process: [https://www.cacd.uscourts.gov/honorable-autumn-](https://www.cacd.uscourts.gov/honorable-autumn-d-spaeth)  
10 [d-spaeth](https://www.cacd.uscourts.gov/honorable-autumn-d-spaeth);
- 11 E. Persons to whom disclosure is compelled by law, including (but not  
12 limited to) by subpoena, warrant, or court order with 14 days prior  
13 notice to all counsel of record for the Plaintiff, further before disclosure  
14 is made Defendants will advise the requesting party of this Order and  
15 request that they sign the agreement to be bound by this Protective  
16 Order;
- 17 F. Persons to whom disclosure is necessary in order for Defendants to  
18 obtain relevant discovery or otherwise prepare a good-faith defense,  
19 after signing the agreement to be bound by this Protective Order. If  
20 such person(s) or their counsel fails or refuses to sign that agreement,  
21 the Parties shall meet and confer regarding the proposed disclosure.  
22 Consent shall not be unreasonably withheld. If the Parties fail to reach  
23 consent, they hereby agree that such dispute shall be resolved pursuant  
24 to the Magistrate Judge's Informal Discovery Dispute Resolution  
25 Process: <https://www.cacd.uscourts.gov/honorable-autumn-d-spaeth>;
- 26 G. Independent providers of document reproduction, electronic discovery,  
27 or other litigation services retained or employed specifically in  
28

1 connection with this litigation, after signing the agreement to be bound  
2 by this Protective Order;

3 H. Court reporters, recorders, and videographers engaged for depositions,  
4 after signing the agreement to be bound by this Protective Order;

5 I. Any mediator appointed by the Court or jointly selected by the Parties,  
6 after signing the agreement to be bound by this Protective Order;

7 J. Any expert witness, outside consultant, or investigator retained  
8 specifically in connection with this litigation, after signing the  
9 agreement to be bound by this Protective Order;

10 K. Any deponent or fact witness and their counsel, after signing the  
11 agreement to be bound by this Protective Order— subject to disclosure  
12 occurring no earlier than 15 days prior to the noticed deposition date or  
13 date of trial testimony. If the deponent or fact witness or their counsel  
14 fails or refuses to sign that agreement, the Parties shall meet and confer  
15 regarding the proposed disclosure. Consent shall not be unreasonably  
16 withheld. If the Parties fail to reach consent, they hereby agree that such  
17 dispute shall be resolved pursuant to the Magistrate Judge’s Informal  
18 Discovery Dispute Resolution Process:

19 <https://www.cacd.uscourts.gov/honorable-autumn-d-spaeth;>

20 L. Government agencies and agency personnel, including law enforcement  
21 and law enforcement personnel, but only to the extent that the  
22 disclosure of Plaintiff’s True Identity is necessary to litigate any claims  
23 or defenses or to comply with any applicable legal obligations or  
24 requirements; and

25 M. Other persons or entities as needed to litigate any claims or defenses  
26 upon consent of the Parties. A meet and confer must be held regarding  
27 any such disclosure. Consent shall not be unreasonably withheld. If the  
28 Parties fail to reach consent on a disclosure that is not expressly

1 authorized under the terms of this Protective Order, the Parties hereby  
2 agree that such dispute shall be resolved pursuant to the Magistrate  
3 Judge's Informal Discovery Dispute Resolution Process:

4 <https://www.cacd.uscourts.gov/honorable-autumn-d-spaeth>.

5 4. The provisions of this Order shall apply to any disclosure of Plaintiff's  
6 True Identity throughout the course of this Action, regardless of whether such  
7 disclosure may occur through written, electronic, or oral means. Plaintiff's True  
8 Identity may not be disclosed or used for any other purpose other than litigating this  
9 action.

10 5. The Parties and any non-parties shall redact from all public filings all  
11 identifying information of Plaintiff, including: (i) name and aliases; (ii) names of  
12 family members; (iii) date of birth; (iv) social security number or other government-  
13 issued identification numbers; (v) addresses; (vi) phone numbers; (vii) photographs  
14 or other images; (viii) physical descriptors; (ix) medical records; and (x) social  
15 media or other online accounts, including accounts on Pornhub, Redtube, or other  
16 sites owned by Defendants. Upon the filing of a redacted document, the filing party  
17 must simultaneously file an unredacted copy under seal and provide an unredacted  
18 copy to the other party. This order shall constitute the specific court order required  
19 for filing under seal pursuant to Local Rule 79-5.2.2. In other words, the parties  
20 need not file a further administrative motion prior to each filing under seal pursuant  
21 to this Protective Order. For avoidance of doubt, redactions should not be applied to  
22 the documents exchanged in discovery between the parties on the basis of this  
23 Protective Order.

24 6. To the extent any Party or non-party has questions or concerns about  
25 whether any forthcoming filing complies with the requirements of this Order, such  
26 party or nonparty should seek leave of Court prior to submitting any such filing.

27  
28 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

1 DATED: November 8, 2024

/s/ Michael J. Bowe

2 Michael J. Bowe  
3 mbowe@brownrudnick.com  
4 Lauren Tabaksblat  
5 **BROWN RUDNICK LLP**  
6 ltabaksblat@brownrudnick.com  
7 7 Times Square  
8 New York, NY 10036  
9 Phone: 212.209.4800  
10 Fax: 212.209.4801

11 David M. Stein (State Bar #198256)  
12 dstein@olsonstein.com  
13 **OLSON STEIN LLP**  
14 240 Nice Lane #301  
15 Newport Beach, CA 92663  
16 Phone: 949.887.4600

17 *Attorneys for Plaintiff*

18 DATED: November 8, 2024

/s/ Esteban Morales Fabila

19 Seth R. Goldman (*pro hac vice app.*  
20 *forthcoming*)  
21 srgoldman@mintz.com  
22 MINTZ, LEVIN, COHN, FERRIS,  
23 GLOVSKY AND POPEO, P.C.  
24 919 Third Avenue  
25 New York, NY 10022  
26 Telephone: (212) 692-6845  
27 Facsimile: (212) 983-3115

28 Peter A. Biagetti (*admitted pro hac*  
*vice*)  
pabiagetti@mintz.com  
MINTZ, LEVIN, COHN, FERRIS,  
GLOVSKY AND POPEO, P.C.  
One Financial Center  
Boston, MA 02111  
Telephone: (617) 542-6000  
Facsimile: (617) 542-2241

1 Arameh Z. O'Boyle (SBN 239495)  
2 azoboyle@mintz.com  
3 Esteban Morales Fabila (SBN 273948)  
4 emorales@mintz.com  
5 MINTZ, LEVIN, COHN, FERRIS,  
6 GLOVSKY AND POPEO, P.C.  
7 2049 Century Park East, Suite 300  
8 Los Angeles, CA 90067  
9 Telephone: (310) 586-3200  
10 Facsimile: (310) 586-3202

11 *Attorneys for Defendants MindGeek*  
12 *S.à r.l., MG Freesites Ltd, MindGeek*  
13 *USA Incorporated, MG Premium Ltd,*  
14 *MG Global Entertainment Inc., and*  
15 *9219-1568 Quebec Inc.*

16 DATED: November 8, 2024

17 /s/ Ronald G. White

18 Ronald G. White  
19 rwhite@wmhwlaw.com  
20 **Walden Macht Haran & Williams**  
21 **LLP**  
22 250 Vesey Street, 27<sup>th</sup> Floor  
23 New York, New York 10281  
24 Telephone: 212.335.2387

25 *Attorney for Defendant Bernd Bergmair*

26 DATED: November 8, 2024

27 /s/ Matthew V. Povolny

28 Jason Brown  
JBrown@CohenGresser.com  
Matthew V. Povolny  
mpovolny@cohengresser.com  
**Cohen & Gresser LLP**  
800 Third Avenue  
New York, NY 10022  
Telephone: 212.957.7561

*Attorneys for Defendant Feras Antoon*

1  
2 DATED: November 8, 2024

/s/ Jonathan S. Sack

Jonathan S. Sack

jsack@maglaw.com

**Morvillo Abramowitz Grand Iason &  
Anello P.C.**

565 Fifth Avenue

New York, New York 10017

Telephone: 212.880.9410

*Attorney for Defendant David Tassillo*

10 DATED: November 8, 2024

/s/ Drew Tulumello

Drew Tulumello

Drew.Tulumello@weil.com

Arianna Scavetti

arianna.scavetti@weil.com

Sydney Hargrove

Sydney.Hargrove@weil.com

**Weil, Gotshal & Manges LLP**

2001 M Street NW

Washington, DC 20036

Telephone: 202.682.7000

Nicole Comparato

Nicole.Comparato@weil.com

**Weil, Gotshal & Manges LLP**

1395 Brickell Avenue, Suite 1200

Miami, FL 33131-3368

Nicole.Comparato@weil.com

Telephone: 305.577.3100

*Attorneys for Defendant Visa, Inc.*

25 DATED: November 8, 2024

/s/ James M. Pearl

James M. Pearl

jamespearl@paulhastings.com

**Paul Hastings LLP**



1 1999 Avenue of the Stars, 27th Floor  
2 Century City, CA 90067  
3 Telephone: 310.620.5700

4 Adam M. Reich  
5 adamreich@paulhastings.com  
6 **Paul Hastings LLP**  
7 515 Flower St, 25th Floor  
8 Los Angeles, CA 90071  
9 Telephone: 213.683.6000

10 *Attorneys for Defendant Redwood*  
11 *Capital Management, LLC*

12 DATED: November 8, 2024

13 /s/ David G. Hille

14 David G. Hille  
15 dhille@whitecase.com  
16 Kevin C. Adam  
17 kevin.adam@whitecase.com  
18 **White & Case LLP**  
19 1221 Avenue of the Americas  
20 New York, NY 10020-1095  
21 Telephone: 212.819.8200

22 Russell J. Gould (Bar No. 313352)  
23 russell.gould@whitecase.com  
24 **White & Case LLP**  
25 555 South Flower Street, Suite 2700  
26 Los Angeles, CA 90071-2433  
27 Telephone: 213.620.7700

28 *Attorneys for Defendant Colbeck*  
*Capital Management, LLC*

1 **FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.**  
2

3 DATED: January 15, 2025  
4

/s/ Autumn D. Spaeth  
Honorable Autumn D. Spaeth  
United States Magistrate Judge  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

EXHIBIT A

AGREEMENT TO BE BOUND BY PROTECTIVE ORDER

I, \_\_\_\_\_ [print or type full name], of  
\_\_\_\_\_ [print or type full address], declare under penalty of perjury  
that I have read in its entirety and understand the Stipulated Pre-Trial Protective  
Order as to the Identity of Plaintiff C.S. that was issued by the United States District  
Court for the Central District of California in the case of *C.S. v. MindGeek S.A.R.L.*  
*et al.*, Case No. 2:24-cv-04992-WLH-ADS. I agree to comply with and to be bound  
by all the terms of this Order, and I understand and acknowledge that failure to so  
comply could expose me to sanctions and punishment in the nature of contempt. I  
solemnly promise that I will not disclose in any manner any information or item that  
is subject to this Order to any person or entity except in strict compliance with the  
provisions of this Order.

I further agree to submit to the jurisdiction of the United States District Court  
for the Central District of California for the purpose of enforcing the terms of this  
Order, even if such enforcement proceedings occur after termination of this action.

I hereby appoint \_\_\_\_\_ [print or type full name] of  
\_\_\_\_\_ [print or type full address and  
telephone number] as my California agent for service of process in connection with  
this action or any proceedings related to enforcement of this Order.

Date: \_\_\_\_\_

City and State where sworn and signed: \_\_\_\_\_

Printed name: \_\_\_\_\_

Signature: \_\_\_\_\_